

FEDERAL PUBLIC DEFENDER

DISTRICT OF NEW JERSEY

K. ANTHONY THOMAS, FEDERAL PUBLIC DEFENDER



800-840 COOPER STREET • SUITE 350 • CAMDEN, NEW JERSEY 08102 • (856) 757-5341

January 29, 2024

Honorable Ann Marie Donio
United States Magistrate Judge
Mitchell H. Cohen Federal Courthouse
Fourth and Cooper Streets
Camden, New Jersey 08101

Re: United States v. Aliyah Banks
Case No. 24mj2000 (AMD)

Dear Judge Donio:

Please accept this letter brief in lieu of a more formal motion for Ms. Banks' release on bail. Moreover, counsel respectfully requests a hearing to present proposed conditions of release, outlined below, for Ms. Banks.

An Initial Appearance was held in this case on January 26, 2024. At that time, a detention hearing was held and this Court denied defendant's application for release on bail. The Court inquired as to whether defense had a proposed third-party custodian. Defense did not, therefore release was denied without prejudice for the defense to propose a potential bail package. Since that time, defense now has a proposed third-party custodian to present to the court.

If released, Ms. Banks would live with her sister, Chaniece Banks, who has agreed to be a third-party custodian. Undersigned counsel has explained that role to her and provided her information to pretrial services to ensure she is an appropriate party to act in this role. Chaniece Banks resides in Edgewater Park, New Jersey, and is employed as a nurse. Undersigned has spoken to her, and Chaniece Banks has agreed to report any potential violations of pretrial release conditions this Court may impose, if they are to arise. Undersigned has also spoken to the Defendant and explained what a third-party custodian would entail if she were to be released.

Defense asks for the soonest available date to hold a bail hearing in this matter, and thanks the Court for its consideration.

/s/ Ikram Ally
Assistant Federal Public Defender

Cc: Andrew N. D'Aversa, AUSA
Acheme Amali, USPO